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**EXHIBIT B**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT INTERFERENCES

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WALTER C. FIERIS :  
v. : Interference No. 101,096  
MICHEL REVEL, ET AL. :  
v. :  
HARUO SUGANO, ET AL. :  
-----X

SUGANO, ET AL. OPPOSITION OF THE MOTION  
OF JUNIOR PARTY WALTER C. FIERIS TO AMEND  
THE ISSUE BY SUBSTITUTION OF PROPOSED COUNT  
2 FOR COUNT 1 OR BY THE ADDITION OF PROPOSED  
COUNT 2 AND BY ADDITION OF PROPOSED COUNTS 3-9  
PURSUANT TO 35 C.R.F. §1.231(a)(2)

The party Sugano et al. hereby opposes the motion of Fiers to amend the issue in this interference by substitution of proposed count 2 for count 1 or by addition of proposed count 2 and by addition of proposed counts 3-9. This opposition is specifically directed to the Fiers Motion as it regards proposed counts 3-9.

With regard to the Fiers proposed counts 3-9 the Fiers motion should be denied for failure to comply with the requirements of 37 C.F.R. §1.231(a)(2). As provided therein, to amend the issue by addition or substitution of new counts, the moving party must demonstrate why a proposed count is necessary or why a count proposed to be substituted is preferable to the original count. Furthermore, the moving party must demonstrate patentability of the counts to all parties and must apply the proposed count to all involved applications except an application which the proposed count

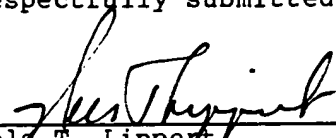
originated. Clearly Fiers has failed to comply with such requirements.

As it pertains to proposed counts 3 through 9, the Fiers motion consist merely of an invitation to the other parties to demonstrate patentability of the subject matter such counts to them. It fails to demonstrate patentability of the proposed counts to any of the other interfering applications. Accordingly the motion should be denied for such reason.

CONCLUSION

For the foregoing reasons the motion of Fiers to amend the issue by addition of proposed counts 3 through 9 should be denied.

Respectfully submitted,

  
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Attorney for the Party  
Sugano, et al.  
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WALTER C. FIERIS :

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Interference No. 101,096

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Date of Deposit Sept. 10, 1984

I hereby certify that this paper or fee is being deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 CFR 1.10 on the date indicated above and is addressed to the Commissioner of Patents and Trademarks, Washington, D. C. 20231.

KENRIC WONG

(Typed or printed name of person mailing paper or fee)

(Signature of person mailing paper or fee)

CERTIFICATE OF SERVICE

This is to certify that copies of the following annexed papers have been mailed to the party Revel et al., through their attorney, Roger L. Browdy, Esq., Browdy and Neimark, 419 Seventh Street, N.W., Suite 300, Washington, D. C. 20004, and to the party Fiers, through his attorney, James F. Haley, Jr., Esq., Fish and Neave, 875 Third Avenue, 29th Floor, New York, N.Y. 10022, on this 10th day of September, 1984, by first class mail, postage prepaid:

1) Sugano et al. Opposition to the Motion of Junior Party Walter C. Fiers to Dissolve this Interference Pursuant to 37 C.F.R. §1.231(a)(1) as to Sugano et al.;

2) Sugano et al. Opposition to the Motion by Revel et al. to Dissolve Under 37 C.F.R. §1.231(a)(1) as to Sugano et al. for Lack of Support;

3) Sugano et al. Opposition to the Motion of Revel et al. to be Accorded the Benefit of an Earlier Application Under 37 C.F.R. §1.231(a)(4)

4) Sugano et al. Opposition to the Motion of Junior Party Walter C. Fiers To Amend the Issue by Substitution of Proposed Count 2 for Count 1 or by the Addition of Proposed Count 2 and by Addition of Proposed Counts 3-9 Pursuant to 35 C.F.R. §1.231(a)(2).

  
Neil T. Libbert